



# OLSEN THIELEN & CO., LTD.

Certified Public Accountants & Consultants

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May 6, 2002

Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554  
Attention: Wireline Competition Bureau

FRN No. 0004-3102-98

CC Docket No. 96-45

Griggs County Telephone Company, in compliance with 47 CFR Section 54.315 and notification by the Public Service Commission for the State of North Dakota, dated February 22, 2002, that Rural Incumbent Local Exchange Carriers should file Disaggregation plans directly with the Federal Communications Commission, hereby files the attached "Self-Certification of Disaggregation and Targeting Plan for Universal Service Funds by Griggs County Telephone Company".

Please call me at (651) 481-1786 with any questions.

Sincerely,

Tom Farm  
President  
Olsen Thielen & Co., LTD.

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cc: Public Service Commission of North Dakota  
USAC  
Sharon Webber, Deputy Chief, FCC-Telecommunications Access Policy Division

Associated World-wide with Jeffreys Henry International

223 Little Canada Road, St. Paul, Minnesota 55117-1376 651 483 4521 FAX 651 483 2467

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**CERTIFICATION OF DISAGGREGATION PLAN FOR  
FEDERAL UNIVERSAL SERVICE FUNDS BY  
Griggs County Telephone Company  
DATE: MAY 6, 2002**

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**Contacts:**

**Griggs County Telephone  
Company:**

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**Olsen Thielen & Co., Ltd:**

Thomas R. Farm, President  
Olsen Thielen & Co., Ltd  
223 Little Canada Rd.  
St. Paul, MN 55117-1376

**Study Area Code (SAC) No:** 381615

Griggs County Telephone Company, hereby files its selection of "Path 3" Self-Certification of Disaggregation and Targeting USF Support pursuant to 47 CFR Section 54.315 and notification by the Public Service Commission for the State of North Dakota, dated February 22, 2002, that Rural Incumbent Local Exchange Carriers should file Disaggregation plans directly with the Federal Communications Commission and certifies that its plan is in conformance with FCC requirements that its disaggregation plan, as discussed in Attachments 1-3 herein:

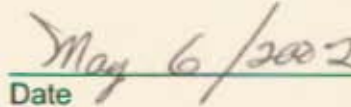
- Disaggregates support to the wire center level or into no more than two cost zones per wire center plan.
- Complies with prior North Dakota state regulatory determinations and that it is supported by the description of the rationale used including methods and data relied upon as included in Attachments 1 and 2.
- Is reasonably related to the cost of providing service for each disaggregation zone within each disaggregated category of support.
- Clearly specifies the per-line level of support for each category if high-cost universal service support provided pursuant to sections 54-301, 54-303, and/or 54.305 and/or part 36, subpart F of Chapter I, Title 47 CFR.
- Uses Loop cost above a Benchmark of \$20.00/per line/per month to allocate High Cost Loop Support, ICL Support and Long Term Support. The \$20.00 per line/per month is equal to 1/12 of the Nationwide average annual loop cost of \$240.00 established by the FCC.
- Is designed such that support available to Griggs County Telephone Company's study area under the disaggregation plan shall equal the total support available to the study area without disaggregation and that the ratio of per-line support between disaggregation zones for each disaggregated category of support shall remain fixed over time, except as changes are allowed pursuant to 47 CFR 54.315 paragraph "C" and "D".



Griggs County Telephone Company certifies that it will disaggregate and target support under this plan for at least four years from the date of this certification except as provided in CFR 47, 54.315, H (D) (5).



Ray Brown, President  
Griggs County Telephone Company



Date

- Attachments:
- 1) Listing of Zones, Rationale, and Description of Zones
  - 2) Data used to develop disaggregation zones
  - 3) Zone Maps

**CERTIFICATION OF DISAGGREGATION PLAN FOR  
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**Study Area Code (SAC) No:** 381615

**A) Monthly Dollars Per line and % allocation of support amount by Zone:**

Zone		High Cost Loop Support	Interstate CL Support	LTS	LSS	Total
Zone 1	Dollars/Line	\$0.87	\$1.75	\$0.81	\$6.24	\$9.67
	% Allocation of Support	16.27%	16.27%	16.27%	43.63%	27.33%
Zone 2	Dollars/Line	\$4.45	\$8.93	\$4.13	\$8.00	\$25.50
	% Allocation of Support	83.73%	83.73%	83.73%	56.37%	72.67%

**B) Description of the rational used for targeting support.**

1. A forward looking cost analysis<sup>1</sup> was completed by Wire Center.
2. USF High Cost Loop Support and, Long Term Support based on 2<sup>nd</sup> Quarter 2002 USAC estimates and April 19, 2002 NECA estimates of ICL amounts, were allocated to Wire Centers using calculations based on relative identified cost above a \$20.00 per line per month benchmark amount for Loop costs. Local Switch Support based on 2<sup>nd</sup> Quarter 2002 USAC estimates was allocated to Wire Centers based on relative identified switch costs.
3. The 20.00 per line benchmark was based on 1/12 of the nationwide annual loop cost of \$240.00 as identified by the FCC.
4. A reasonableness check of relative USF assignments on a Wire Center Level based on Management knowledge and experience was completed.
5. In those cases where a common Zone(s) on a wire center basis appeared reasonable, weighted average amounts of support per line were computed.

**C) Description of each Zone.**

Zone	Total Exchanges / (Wire Centers) Include	Partial Exchange s / (Wire Centers) Include
Zone 1	Cooperstown	None
Zone 2	Binford, Finley, and McHenry	None

<sup>1</sup>In the absence of Actual cost data, forward looking cost have been used as a reasonable surrogate of "relative" cost between exchanges. The use of these cost for this purpose should not be construed as an admission by Griggs County Telephone Company that it in any way supports the use of these costs as it's actual cost of providing telephone service or for purposes of deriving the overall level of USF support that is received by Griggs County Telephone Company.

**CERTIFICATION OF DISAGGREGATION PLAN FOR  
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DATE: MAY 6, 2002**

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- Exchange/Zone Level Disaggregation Analysis.



## Exchange Level Disaggregation Analysis

## Company: Griggs County Telephone Co.

Cost Basis: Avg. Schedule

USAC Code 381615

## Monthly Benchmark Cost Levels:

\$ 30.00	Total Costs
\$ 20.00	Loop Costs
\$ -	Switch Costs

"Estimated" Annual ICL Support (NECA)

\$ 141,069.48

Fed USF Support Dollars/Month (2nd Qtr 2002 USAC Estimate)						
Loop	Common Line	Long Term Support	Local Switching	Total	No. Access Lines	Switched Lines (Company Data)
Total	\$ 5,857.00	\$ 11,755.79	\$ 5,432.00	\$ 15,646.00	\$ 38,690.79	2196
Per Access Line	\$ 2.67	\$ 5.35	\$ 2.47	\$ 7.12	\$ 17.62	

## 1 Zone Per Exchange Analysis:

(Based on Allocation of USF Based on Average Exchange Costs)

Exchange	Access Lines	Federal USF Support Dollars/Month				
		Loop	Common Line	Long Term Support	Local Switching	Total
Binford	259	\$ 4.88	\$ 9.79	\$ 4.52	\$ 8.85	\$ 28.03
Coopersdown	1094	\$ 0.87	\$ 1.75	\$ 0.81	\$ 6.24	\$ 9.67
Finley	636	\$ 4.30	\$ 8.64	\$ 3.99	\$ 6.63	\$ 23.56
Mchenry	207	\$ 4.36	\$ 8.76	\$ 4.05	\$ 11.16	\$ 28.33
Total	2196	\$ 2.67	\$ 5.35	\$ 2.47	\$ 7.12	\$ 17.62

(Based on Allocation of USF Based on Average Exchange Costs)

Exchange	Access Lines	Zone Groups						
		Zone 1	Zone 2	0	0	0	0	0
Binford	259	\$ -	\$ 7,250.34	\$ -	\$ -	\$ -	\$ -	\$ 28.03
Coopersdown	1,094	\$ 10,575.20	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 9.67
Finley	636	\$ -	\$ 14,992.36	\$ -	\$ -	\$ -	\$ -	\$ 23.56
Mchenry	207	\$ -	\$ 5,872.89	\$ -	\$ -	\$ -	\$ -	\$ 28.33
Total	2,196	\$ 10,575.20	\$ 28,115.59	\$ -	\$ -	\$ -	\$ -	\$ 17.62
Average USF per Line		\$ 9.67	\$ 25.50	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!

\$ 38,690.79

## Exchange Level Disaggregation Analysis

Company: Griggs County Telephone Co.

Access Lines Per Group

Exchange	Access Lines	Zone Groups					
		Zone 1	Zone 2	0	0	0	
Binford	259	-	259	-	-	-	\$ 28.03
Cooperstown	1,094	1,094	-	-	-	-	\$ 9.67
Finley	636	-	636	-	-	-	\$ 23.56
Mchenry	207	-	207	-	-	-	\$ 28.33
Total	2,196	1,094	1,102	-	-	-	\$ 17.62

2,196

Group	Exchanges	Access Lines	Federal USF Support Dollars/Month				
			Loop	Common Line	Long Term Support	Local Switching	Total
Zone 1		0	0	0	0	0	\$ -
	Cooperstown	1094	953	1913	884	6826	\$ 10,575.20
		0	0	0	0	0	\$ -
		0	0	0	0	0	\$ -
	Total	1094	\$ 952.87	\$ 1,912.53	\$ 883.72	\$ 6,826.08	\$ 10,575.20
% of Total Support Amounts			16.27%	16.27%	16.27%	43.63%	27.33%

Federal USF Support Dollars/Month				
\$ 0.87	\$ 1.75	\$ 0.81	\$ 6.28	\$ 9.67

Group	Exchanges	Access Lines	Federal USF Support Dollars/Month				
			Loop	Common Line	Long Term Support	Local Switching	Total
Zone 2	Binford	259	\$ 1,261.05	\$ 2,531.11	\$ 1,169.55	\$ 2,288.63	\$ 7,250.34
		0	\$ -	\$ -	\$ -	\$ -	\$ -
	Finley	636	\$ 2,738.34	\$ 5,496.23	\$ 2,539.64	\$ 4,218.15	\$ 14,992.36
	Mchenry	207	\$ 904.73	\$ 1,815.92	\$ 839.08	\$ 2,313.15	\$ 5,872.89
	Total	1102	\$ 4,904.13	\$ 9,843.26	\$ 4,548.28	\$ 8,819.92	\$ 28,115.59
% of Total Support Amounts			83.73%	83.73%	83.73%	56.37%	72.67%

Federal USF Support Dollars/Month				
\$ 4.45	\$ 8.93	\$ 4.13	\$ 6.00	\$ 25.50

Total 2196 \$ 5,857.00 \$ 11,755.79 \$ 5,432.00 \$ 15,646.00 \$ 38,690.79

## Exchange Level Disaggregation Analysis

Company

Groggs County Telephone Co.

Monthly Benchmark Cost Levels:

\$	30.00	Total Costs
\$	20.00	Loop Costs
\$	-	Switch Costs

Exchange Name	Wire Center ID	USAC USF Loops (Allocated based on Cost Study Counts)	Cost Study Loops (Switched Lines)	Costs per Line/ Mo			Total Costs per/ Mo			Per Line Costs above Benchmark/Mo			Total Costs above Benchmark/Mo		
				Total	Loop	Switch Plus Port	Total	Loop	Switch Plus Port	Total	Loop	Switch Plus Port	Total	Loop	Switch Plus Port
1 Buford	BNFRNOXA	259	207	\$ 261.88	\$ 187.65	\$ 0.37	\$ 67.251	\$ 44.762	\$ 2.503	\$ 221.88	\$ 147.65	\$ 0.37	\$ 69.241	\$ 30.422	\$ 2.503
2 Coopersdown	CPYWN0XA	1094	1,179	\$ 175.04	\$ 150.30	\$ 6.61	\$ 71.527	\$ 52.368	\$ 7.465	\$ 33.35	\$ 26.38	\$ 6.61	\$ 37.657	\$ 20.788	\$ 7.465
3 Finley	FINLYNOXA	636	607	\$ 306.56	\$ 152.16	\$ 7.02	\$ 115.001	\$ 98.744	\$ 4.613	\$ 149.04	\$ 130.30	\$ 7.02	\$ 65.291	\$ 85.604	\$ 4.613
4 McHenry	MCNHN0XA	207	214	\$ 140.79	\$ 100.77	\$ 7.55	\$ 319.167	\$ 228.438	\$ 17.111	\$ 110.79	\$ 80.77	\$ 7.55	\$ 251.157	\$ 183.098	\$ 17.111
<b>Total</b>		<b>2194</b>	<b>2,207</b>												



Company: Griggs County Telephone

Exchange Name	Wire Center ID	USAC USF Loops (Allocated Based on Cost Study Counts)	Percent of Total Cost above benchmark			Fed USF Support Dollars/Month					Fed USF Support Dollars/Month/Line				
			Total	Loop	Switch Plus Port	Loop	Common Line	Long Term Support	Local Switching	Total	Loop	Common Line	Long Term Support	Local Switching	Total
Bimford	BH-FRNDXA	259	23.69%	21.53%	14.63%	\$ 1,261.05	\$ 2,531.11	\$ 1,169.55	\$ 2,288.63	\$ 7,250.34	\$ 4.89	\$ 9.70	\$ 4.52	\$ 8.65	\$ 28.03
Cooperstown	CPTWHDXA	1094	14.90%	16.27%	43.63%	\$ 952.87	\$ 1,912.53	\$ 883.72	\$ 6,826.08	\$ 10,575.20	\$ 0.87	\$ 1.75	\$ 0.81	\$ 6.24	\$ 9.67
Finley	FNLYNDXA	636	37.94%	46.76%	26.86%	\$ 2,738.34	\$ 5,496.23	\$ 2,539.64	\$ 4,218.15	\$ 14,992.36	\$ 4.30	\$ 8.64	\$ 3.69	\$ 6.63	\$ 23.56
McHenry	MCH-HNDXA	207	23.48%	15.45%	14.78%	\$ 904.73	\$ 1,815.92	\$ 839.08	\$ 2,313.15	\$ 5,872.89	\$ 4.36	\$ 8.70	\$ 4.05	\$ 11.16	\$ 28.33
<b>Total</b>		<b>2196</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>\$ 5,857.00</b>	<b>\$ 11,755.79</b>	<b>\$ 5,432.00</b>	<b>\$ 15,648.00</b>	<b>\$ 38,690.79</b>	<b>\$ 2.67</b>	<b>\$ 5.35</b>	<b>\$ 2.47</b>	<b>\$ 7.12</b>	<b>\$ 17.62</b>

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This attachment contains maps indicating the USF Disaggregation Zones as described in Attachment 1, Section C.



